

**GOLDBERG
SEGALLA**

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April 25, 2024

VIA ECF

Hon. P. Kevin Castel, U.S.D.J.
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Starling v. Blueline Team, Inc., 1:23-cv-8377

Dear Judge Castel:

As the Court is aware, this firm represents Defendant Blueline Team, Inc. ("Defendant") in the above-referenced action. We write pursuant to the Court's Individual Practices to request that the Court briefly: a) extend the deadline for Defendant to respond to Plaintiff's Letter re: the Merits of Plaintiff's Individual Claims (*See*, ECF Dkt. No. 22) (the "Letter") by four days, and b) adjourn the status conference currently scheduled for May 3, 2024. Defendant's response to the Letter is currently due on April 29, 2024. If this request is granted, Defendant would submit its response to the Letter by May 3, 2024 and we propose that the Court adjourn the status conference to May 10, 2024, or anytime thereafter when the Court is available.

The primary reason for this request is that my contact at Defendant (its principal) and I are observing Passover this week and part of next week. Due to the prohibition on using electricity many days this week and next week, including this weekend, as well as my client's travel schedule with his family for the holiday, my client and I are unable to meet and confer about Defendant's response to the Letter and to finalize it. The current deadline, April 29, 2024, is one of the more religious days of the holiday, where use of electricity is prohibited. The holiday ends at sundown on Tuesday, April 30, 2024.¹ Therefore, an extension to Friday, May 3, 2024 would allow me and the principal of Defendant to meet and confer regarding the response to the Letter.

Additionally, the final fact deposition in this matter is scheduled for May 9, 2024, so adjourning the status conference to or after that date could avoid the need for another conference with the Court.

¹ With this in mind, alternatively, if the Court is disinclined to briefly adjourn the status conference, we ask for an extension until May 2, 2024 to file the response to the Letter.

*Application
GRANTED
Letter response
due May 3.
SO ORDERED
J. Katz
JSDS
4-25-24*

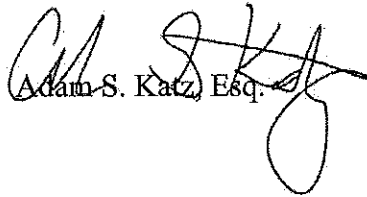
Hon. Kevin P. Castel, U.S.D.J.
April 25, 2024
Page 2

I have consulted with Plaintiff's counsel and they have no position on this request.

This is the first request by Defendant BlueLine to extend this deadline and to adjourn the status conference. Plaintiff previously included a request to adjourn the next conference in its letter seeking to extend the fact discovery deadline and the Court was silent on this aspect of Plaintiff's request. *See* ECF Dkt. 20-21.

We thank the Court for its attention to this request.

Respectfully submitted,


Adam S. Katz, Esq.

AK:sd